EPA Seeks Comments on Six Underground Fluid Injection Permits

Buckeye Terminals, LLC
Wayne County, Michigan May 2019

The U.S. Environmental Protection Agency plans to issue what it calls a Class III area permit for solution mining and five permits for Class I non-hazardous injection wells to Buckeye Terminals, LLC, of Houston, Texas, a limited partnership in the business of transportation, storage, and marketing of liquid petroleum products. The Class III area permit covers 4 proposed cavern wells to be excavated by solution mining of the Salina B Salt formation via injection of fresh water and mineral oil or nitrogen gas to a depth of 1070 feet below the surface, at the Buckeye Terminals facility, located south of West Road and east of Interstate 75 (Detroit-Toledo Freeway) in Woodhaven, Wayne County, Michigan. Brine (salt water) created from injection of freshwater (not to exceed 1.8 million gallons per day) will be injected for disposal into any of the five proposed Class I wells into the Mt. Simon Sandstone, to a depth of 3470 feet below the surface. The top blanket of mineral oil or nitrogen gas is used to control cavern shape during solution mining operations; mineral oil will be recovered (nitrogen will not be recovered). The completed caverns will later be used for storage of liquified petroleum gas.

The local Underground Source of Drinking Water (USDW) is the Sylvania Sandstone, with a maximum depth of 350 feet below surface. To protect the USDW, each Class I and Class III injection well will be designed to prevent migration of injection fluid out of the well into surrounding rock formations by using well casing (steel pipe) with cement between casings. The Class I injection zone (3470 feet depth) will be separated from the USDW by approximately 3120 feet of overlying rock formations (including impermeable rock formations, including the Utica Shale and Black River Formation). The Class III injection zone (1070 feet depth) is overlain by about 720 feet of impermable rock formations (Salina Units C, D, E, F, and G and Bass Island Dolomite).

EPA is accepting comments from the public on these proposed permit approvals (*see box, left*). The public comment period, which ends **July 3, 2019**, includes 30 days for comments as required by law, plus an additional three days for any delay caused by mailing.
During the comment period, you may ask EPA – in writing – to hold a formal public hearing (*see address, left*). Be sure to say specifically what issues you want to raise. EPA will hold a hearing if there is significant interest. If there is a hearing, EPA will publish a notice at least 30 days prior. You will have an opportunity to make oral comments or submit written comments. EPA will consider all comments it receives, and then issue a final decision along with a response to significant comments.

The Safe Drinking Water Act requires EPA to regulate the underground injection of fluids through wells to protect the quality of underground sources of drinking water. Issuing permits is one way EPA does this. You can find the regulations governing underground injection wells at Title 40 of the Code of Federal Regulations, Parts 144 and 146. To learn more about EPA's Underground Injection Control program, or to join our mailing list, visit **http://go.usa.gov/3JwFP**.

How to comment

You may comment on the proposed permits in writing. Please refer to **Buckeye Terminals, LLC**.

Class I permits:
BDW-1: MI-163-1I-0004
BDW-2: MI-163-1I-0005
BDW-3: MI-163-1I-0006
BDW-4: MI-163-1I-0007
BDW-5: MI-163-1I-0008

Class III area permit:
MI-163-3A-0001

Mail or email your comments to:

Allan Batka (Class I permits)
Email: batka.allan@epa.gov
Phone: (312) 353-7316

William Tong (Class III area permit)
Email: tong.william@epa.gov
Phone: (312) 886-9380

U.S. EPA Region 5, Water Division
Permits Branch
77 W. Jackson Blvd. (WU-16J)
Chicago, IL 60604-3590

Comment period

EPA will accept written comments until **July 3, 2019** (midnight postmark).

Administrative Record

You may see the full administrative record, including all data that Buckeye Terminals, LLC has submitted, at EPA's Chicago regional office (see *address above*), between 9 a.m. to 4 p.m. on weekdays. For an appointment to see the files, contact Allan Batka (Class I permits) or William Tong (Class III).

Right to appeal

You have the right to appeal any final permit decision if you make an official comment during the comment period or participate in the public hearing. A public hearing is not planned at this time. The first appeal must be made to the Environmental Appeals Board.